

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

**STEPHEN ALLEN and CODY RHOADES**

**PLAINTIFF**

vs.

No. 5:15-cv-1123-DAE

**EXPRESS ENERGY SERVICES GP, LLC,  
EXPRESS ENERGY SERVICES, LLC, and  
DARRON ANDERSON, Individually and as  
an Officer of EXPRESS ENERGY SERVICES GP, LLC,  
and EXPRESS ENERGY SERVICES, LLC**

**DEFENDANTS**

**JOINT ADR REPORT**

Pursuant to the Court's Scheduling Order and Local Rule CV-88, the Parties submit this Joint ADR Report.

1. Status of Settlement Negotiations. This lawsuit seeks to recover unpaid overtime owed to Plaintiffs. Plaintiffs and Defendants are in the process of informally exchanging compensation data, and Plaintiffs intend to send a formal settlement demand on June 30, 2016, per the Court's scheduling order, ECF No. 22, and the parties will continue this process until a resolution is reached or until the parties reach an impasse.

2. The Persons Responsible for Settlement Negotiations.

Josh Sanford is responsible for settlement negotiations for Plaintiff. Stefanie Moll is responsible for settlement negotiations for Defendant.

3. Whether ADR is Appropriate in this Case. It is unlikely that ADR will be necessary in this case, as the Parties anticipate that they can resolve this matter

themselves without an outside mediator. If, however, the Parties are unable to do so, both are amenable to more formal methods of ADR.

Respectfully submitted,

**PLAINTIFFS STEPHEN ALLEN and  
CODY RHOADES**

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And

**DEFENDANTS EXPRESS ENERGY  
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**CERTIFICATE OF SERVICE**

I, Josh Sanford, do hereby certify that a true and correct copy of the foregoing pleading was electronically filed with the Clerk for the U.S. District Court, Western District of Texas, on July 1, 2016, using the electronic case filing system of the Court. The attorneys listed below are registered to receive an electronic copy hereof.

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/s/ Josh Sanford

**Josh Sanford**